

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO,
EASTERN DIVISION**

LARRY D. REID, et al.,

Plaintiff,

v.

DARRYL D. MOORE,

Defendant.

) **CASE NO.: 1:21-CV 00991**

) **JUDGE: JAMES S. GWIN**

FILED

NOV 8 2022

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

**DEFENDANT DARRYL D. MOORE,
REPLY TO PLAINTIFF'S ERRONEOUS THIRD MOTION TO ENFORCE
SETTLEMENT AND THIRD REQUEST TO DISMISS PLAINTIFF'S COMPLAINT
WITH PREJUDICE**

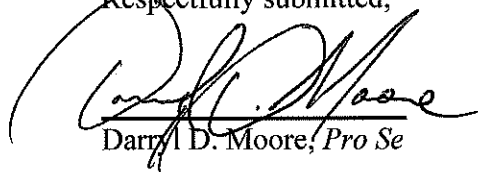
NOW Comes, Defendant, Darryl D. Moore, pro se, hereby respectfully moves this honorable Court to enter an Order dismissing Plaintiff's THIRD Complaint with prejudice. As more fully set forth hereinafter, in that Plaintiff, has failed to present any evidence to show any provision of the order that was allegedly violated by the Defendant. As stated, in that the claims asserted by Plaintiff are inadequately supported by unwarranted deductions of fact or unreasonable inferences, this Court should dismiss his THIRD erroneous claim expeditiously. The reason for this THIRD Motion are made more evident as the Plaintiff escalates his preposterous, puerile postering asserting that the Defendant is making videos about him when the Defendant has not made any videos or co-produced videos where the Plaintiff, staff, or family were named since the mediation was signed by both parties. The Defendant has no control over what other social media content creators discuss on their platforms. The Defendant does not employ these individuals. The Defendant in this case has the right to view the content of other social media content creators as long as he does not create recent videos about the Plaintiff. That

was the language of the mediation. Plaintiff cannot continue to whine and whimper before this honorable Court every time his feelings get hurt. The other content creators are not bound by any mediation agreements. The Defendant complied with the mediation agreement and removed all of his videos about the “alleged child molester” who is the Plaintiff in this legal matter. The Plaintiff seeks to draw this Court into his web of deception, vengeance, and retaliation. The Plaintiff desires to use this Court to harass the Defendant for having the audacity to interview three people that accused him of sexual assault. One of the alleged victims accuses him of infecting him with H.I.V. The Plaintiff was further infuriated because the Defendant requested a copy of his Form 990 for his M.B.N. Network “non-profit”. A request that has not been honored. He has been reported to the I.R.S. for non-compliance by several people. The crux of the matter is the Plaintiff wants this Court to shield him from public exposure as it relates alleged sexual misconduct and theft. Whenever someone creates a video about the Plaintiff, he immediately contacts his legal counsel and falsely claims the Defendant is directly involved in the production of new video content about him. The Plaintiff has made this claim publicly on the social media platform of his employee. The Plaintiff fails to realize that he is disliked by a large group of people that were silent about him because of his bullying and intimidation tactics. That is no longer the case. After the story of the three accusers circulated on social media, the Plaintiff went into damage control mode and sought a mediation with the Defendant to silence his voice. Once the Defendant agreed to cease making videos, other content creators started investigating the background of the Plaintiff. Before the mediation, multiple content creators (Defendant’s educated guess) downloaded the videos made by the Defendant before this honorable Court ordered him to remove them from social media. The Plaintiff is angry because his proverbial dirty laundry has been and continues to be aired.

Furthermore, the Plaintiff, Larry D. Reid who resides at 35 Mount Paran Road NW, Atlanta, GA 30327 has failed to honor the terms of the mediation agreement. He has failed to compel his employees Davyon Charles Demil Augustus (d.b.a. Consciouz TV) who resides at 5322 Ridgeway Street, Columbia, SC 29203, Brian Hugh Henry, II (d.b.a. Knocc Out Media) who resides at 3000 Murworth Drive Apt. 212, Houston, TX 77025, or Andrea N. Garrison who resides at 2886 Briggs Ave Apt. 1E, Bronx, NY 10458 to cease making social media content about the Defendant. The Defendant had to obtain a Civil Stalking Protection Order in Cuyahoga County, OH for THREE years (CV-22-964092) against Augustus and Henry.

Lastly, the Plaintiff views the Defendant as 'low hanging fruit' that he can "cherry pick" and harass via this honorable Court as he sees fit simply because he has the financial backing of a wealthy mentor (Bishop E. Bernard Jordan) and his social media fanbase. The Plaintiff has made no attempt to take legal action against two of his accusers. He is only suing the one that Bishop Lamor Whitehead interviewed on social media. Reid has not brought any legal action against Bishop Whitehead or social media personality Tasha K. A reasonable mind would deduce he is avoiding these individuals because they have the financial wherewithal to fight him in court and expose him. He is currently dodging being served with a \$20,000,000 civil lawsuit from Bishop Lamor Whitehead for slander and defamation. His Co-Defendant DeMario Q. Jives (d.b.a. King Jives) who resides at 7410 Becky Thatcher Lane, Tampa, FL 33673 is also avoiding being served.

Respectfully submitted,

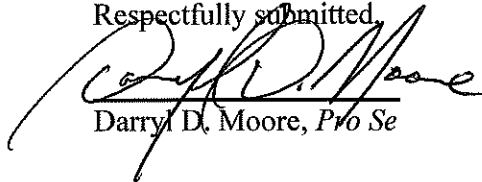


Darryl D. Moore, *Pro Se*

CONCLUSION

Based upon the facts set forth above and for the reasons thereby outlined above, the Defendants' *Motion to Dismiss* with prejudice should be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Darryl D. Moore", is written over a horizontal line. The signature is stylized with a large, sweeping initial "D".

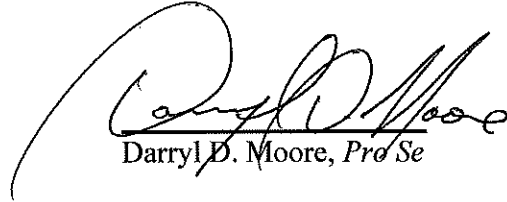
Darryl D. Moore, *Pro Se*

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing *Motion to Dismiss* was made via USPS mail with sufficient postage attached this __3rd__ day of November 2022.

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Darryl D. Moore, *Pro Se*